

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

v.

PARMJIT PARMAR,
a/k/a "Paul Parmar"

Hon. Madeline Cox Arleo

Criminal No. 18-735

**[PROPOSED] CONSENT ORDER
SUBSTITUTING PROPERTY SECURING APPEARANCE BOND**

This matter having come before the Court on the application of Defendant Paul Parmar, through undersigned counsel, for a modification of the Amended Order Setting Conditions of Release, dated July 13, 2018 (ECF No. 24), a copy of which was signed by Mr. Parmar and a third-party custodian on July 26, 2018 (ECF No. 26), secured by a Property Bond entered into on July 26, 2018 (ECF No. 27), and as amended by an August 25, 2021 Order Removing Property (ECF No. 120), and the United States and Pre-Trial Services having consented;

WHEREAS, on July 26, 2018, an Appearance Bond was entered by Mr. Parmar (ECF No. 27) in the amount of \$3,462,911, which was co-signed by Mr. Harmohan Parmar and secured by a combination of cash and real property, including the property at 200 White Road Suite 209 Little Silver, NJ 07739 owned by Dipinder Arora (the "White Road Property"); the property at 432 Route-34 Unit 3, Matawan NJ 07747 owned by Vishal Gupta (the "432 Route 34 Property"); and \$400,000 cash deposited by Harmohan Parmar (the "Cash Deposit");

WHEREAS, on August 25, 2021, the Court ordered the property located at 7305 Belle Meade Island Drive, Miami, FL 33138 owned by John T. Petrozza (the "Belle Meade Property")

to be removed from the list of properties securing the Appearance Bond and voided the July 26, 2018 Agreement to Forfeit Property executed for the Belle Meade Property (ECF No. 120);

WHEREAS, Mr. Parmar and each of Dipinder Arora, Vishal Gupta, and Harmohan Parmar now seek to remove the White Road Property, the 432 Route 34 Property, and the Cash Deposit, respectively, from the properties securing the Appearance Bond;

WHEREAS, the estimated combined value of the White Road Property, the 432 Route 34 Property, and the Cash Deposit is \$812,095;

WHEREAS, Mr. Parmar, Kiran Sharma, as Trustee of the SAKI Irrevocable Trust (the “Trust”), and Gaurav Sharma and Simran Sharma, as the Trust’s sole beneficiaries, agree to add the property located at 28 B Sampson Avenue, Seaside Heights NJ 08751 (the “Sampson Avenue Property”) owned by the Ace Rainbow LLC, which the Trust has 100% ownership interest in, to the properties securing the Appearance Bond, as described further in the Affidavit of Consent and Trustee Authorization for Bail Package Subordination attached hereto as Exhibit A;

WHEREAS, the estimated value of the Sampson Avenue Property pursuant to Zillow.com is approximately \$1.1 million dollars;

WHEREAS, the United States and Pre-Trial Services consent to the request to substitute the properties securing the Appearance Bond as described herein;

NOW, this _____ day of _____, it is **HEREBY ORDERED THAT**:

1. The “Release on Bond” provision of the Amended Order Setting Conditions of Release (ECF No. 26) is modified to remove the White Road Property, the 432 Route 34 Property, and the Cash Deposit, and add the Sampson Avenue Property; and
2. The Property Bond entered into on July 26, 2018 (ECF No. 27), and as amended by an August 25, 2021 Order Removing Property (ECF No. 120), is modified to remove the

White Road Property, the 432 Route 34 Property, and the Cash Deposit from the list of properties currently securing the Property Bond, and the Sampson Avenue Property is added in its place.

3. All other provisions stated in the Conditions of Release and all other properties securing that Order remain in effect.

Form and entry consented to:

/s/ Kelly Lyons
Kelly Lyons
George Barchini
Assistant U.S. Attorneys for the District of New Jersey

/s/ Andrew Goldstein
Andrew Goldstein
John Hemann
Victoria Pasculli
Alessandra Rafalson
Counsel for Defendant Paul Parmar

SO ORDERED:

Honorable Madeline Cox Arleo
United States District Judge